

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2: 18-2323-AB

MDL No. 2323

No. 2: 12-2323-AB

Hon. Anita B. Brody

**NOTICE OF THE LOCKS LAW FIRM
OF INTENT TO ARGUE IN COMPLIANCE WITH
THE COURT'S MAY 7, 2018 ORDER**

The Locks Law Firm ("LLF") respectfully submits this Notice of Intent to Argue in Compliance with the Court's May 7 Order regarding the May 15, 2018 Hearing.

LLF respectfully requests a ten minute allotment to discuss and argue its positions regarding the allocation of attorney's fees from the Attorney's Fees Qualified Settlement Fund. The basis for the LLF's argument, fee request, and proposed allocation are within the following filed documents in case 2:12-md-2323-AB:

1. Document number 7151 (Petition of Co-lead Counsel Seeger Weiss for an Award of Attorney's Fees, etc. with accompanying Exhibits);
2. Document number 7151-7 (the Declaration of Gene Locks in Support of the foregoing Seeger Weiss Petition);
3. Document number 8447 (Declaration of Co-lead Counsel Christopher A. Seeger regarding Proposed Allocation with accompanying Exhibits); and
4. Document number 8709 (Declaration of Class Counsel Gene Locks and accompanying Exhibit in Response to the Seeger Proposed Allocation).

To the extent required or invited by the Court or any party, LLF respectfully requests time to address via argument, witnesses, and evidence issues regarding funding companies with reference to any one or both of the following filed documents:

- a. Document number 20 in case no. 2:18-md-2323-AB (Declaration of Class Counsel Gene Locks with accompanying Exhibits); and
- b. Document number 9921 (Motion for Reconsideration) in case no. 2:12-md-2323-AB.

Dated: May 11, 2018

Respectfully submitted,

/s/ Gene Locks

Gene Locks

David D. Langfitt

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*For identification purposes only